

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ESTHER HOFFMAN; SARAH DOUGLASS;
ANTHONY KIM; and IL KIM and DARIA KIM,
husband and wife and the marital community
comprised thereof, on behalf of themselves and on
behalf of others similarly situated,

Plaintiffs,

vs.

TRANSWORLD SYSTEMS INCORPORATED;
PATENAUE AND FELIX, A.P.C.; MATTHEW
CHEUNG, and the marital community comprised
of MATTHEW CHEUNG and JANE DOE
CHEUNG; National Collegiate Student Loan
Trust 2004-2; National Collegiate Student Loan
Trust 2005-2; National Collegiate Student Loan
Trust 2005-3; National Collegiate Student Loan
Trust 2006-1; National Collegiate Student Loan
Trust 2006-3; National Collegiate Student Loan
Trust 2007-4,

Defendants.

Case No. C18-1132 TSZ

PLAINTIFFS' MOTION TO
TEMPORARILY SEAL
CONFIDENTIAL DOCUMENTS

NOTED FOR HEARING:
July 20, 2021

Plaintiffs ESTHER HOFFMAN; SARAH DOUGLASS; ANTHONY KIM; and IL KIM
and DARIA KIM, husband and wife and the marital community comprised thereof ("Plaintiffs"),
by and through their attorneys, move for permission to seal documents marked "Confidential" by
Defendant Transworld System Incorporated ("TSI").

The parties are negotiating the terms of a stipulated order pertaining to the protection of
documents deemed "Confidential" by the parties. As part of the negotiation and until an
appropriate protective order is entered, Plaintiffs have agreed to protect the confidentiality of

1 documents deemed “Confidential” by the Defendants. Pursuant to the proposed protective order,
2 the parties agreed, “Before filing confidential material or discussing or referencing such material
3 in court filings, the filing party shall confer with the designating party, in accordance with Local
4 Civil Rule 5(g)(3)(A), to determine whether the designating party will remove the confidential
5 designation, whether the document can be redacted, or whether a motion to seal or stipulation
6 and proposed order is warranted.”

7
8 The documents attached hereto were marked as “Confidential” by TSI. On July 19, 2021,
9 Plaintiffs’ counsel for the Plaintiffs requested a discovery conference with counsel for TSI to
10 discuss whether parts of certain documents could be filed in support of the Plaintiffs’ response to
11 TSI’s Motion for Summary Judgment with redactions, or whether a motion to seal would be
12 necessary. *See* Declaration of Christina L Henry in Support of Plaintiffs’ Response to
13 Transworld Systems Incorporated’s Motion for Summary Judgment (“Henry Decl.”) at ¶ 9. An
14 hour and a half after sending the request, Plaintiffs’ counsel telephoned counsel for TSI to meet
15 and confer about the documents. TSI’s counsel informed Plaintiffs’ counsel that although
16 Plaintiffs had permission to temporarily file the documents under seal, TSI needed additional
17 time to confer with their client and other Defendants’ legal counsel, one of whom is currently out
18 of town and unavailable, about the nature of the redactions needed. *See* Henry Decl. at ¶ 10.

19
20 Additionally, Plaintiff’s Response to TSI’s Motion for Summary Judgment references
21 parts of the confidential documents and until these matters are resolved, the unredacted Response
22 also needs to be temporarily sealed with an intention to replace the documents filed in the record
23 with versions in which the Confidential information is redacted upon mutual agreement.

24 The documents designated as Confidential by TSI at issue include the following:
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27

- 1 a) **Ex. A12-14** - 04/21/10 Attorney Network Services Agreement
2 (TSI_0022496 – TSI_0022512);
3 b) **Ex. A12-15** - 11/05/2012 Amendment to Addendum A to Attorney
4 Network Services Agreement (TSI_0022541- TSI_0022543);
5 c) **Ex. A12-17** -. 06/22/15 Amendment to Addendum “A” to Attorney
6 Network Services (TSI_0022539- TSI_0022540);
7 **Ex. A12-18** - 01/06/16 Amendment to Addendum A to Attorney Network
8 (TSI_0022570- TSI_0022571);

9 Lastly, in the process of preparing the sealed documents for filing, Plaintiff’s counsel
10 learned that Ex. A attached to Dkt No. 185 inadvertently contains confidential documents
11 attached to what was intended to be a document with no confidential material. Upon the
12 opening of business, the court clerk will be contacted immediately to seal Dkt No 185-1
13 and that document will be refiled with a praecipe to attach the corrected Exhibit A. As
14 some of the documents in Dkt No. 185-1 are the ones that form the basis for this motion,
15 this motion to seal is filed until seal.

16 Wherefore, based on the foregoing, Plaintiffs request that the court temporarily allow
17 Exhibits A12-14, A12-15, A12-17 and A12-18 to be filed under seal, together with
18 Plaintiffs’ Response to TSI’s Motion for Summary Judgment. Plaintiff additionally asks
19 that Dkt NO. 185-1 be sealed permanently.

20 Respectfully submitted this 20th day of July, 2021.
21

22 ***Attorneys for Plaintiffs:***

23 LEONARD LAW

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/s/ Guy Beckett

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